

IT IS SO ORDERED.

s/Pamela A. Barker IN THE UNITED STATES DISTRICT COURT
PAMELA A. BARKER, FOR THE NORTHERN DISTRICT OF OHIO
U.S. DISTRICT JUDGE CLEVELAND DIVISION

UNITED STATES OF AMERICA,)	CRIMINAL NO.: 1:21-cr-226
)	
Plaintiff,)	
)	JUDGE PAMELA A. BARKER
vs.)	
)	
DAVIS LU,)	
)	
Defendant.)	

**DEFENDANT'S MOTION FOR LEAVE
TO FILE UNDER SEAL**

Now comes the Defendant, Davis Lu, by and through undersigned counsel, Friedman, Nemecek, Long & Grant, L.L.C., and hereby respectfully requests leave of this Honorable Court to file its Brief in Opposition to the Government's Motion to Exclude Defense Expert's Report and Inadmissible Testimony (ECF #50) under seal. The Brief contains sensitive and proprietary information concerning the Corporation as well as other third-parties. Public disclosure of this information could be harmful to the Corporation. After filing, the defense will serve counsel for the Government with the document via e-mail.

Respectfully submitted,

/s/ Eric C. Nemecek
Eric C. Nemecek (0083195)
Ian N. Friedman (0068630)
Counsel for Defendant
Friedman Nemecek Long & Grant, L.L.C.
1360 East 9th Street, Suite 650
Cleveland, Ohio 44114
P: (216) 928-7700
F: (216) 820-4659
E: ecn@fanlegal.com
E: inf@fanlegal.com